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July 19, 2018

VIA ECF and FAX (212-805-7986)

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: Wesco Insurance Company, et al. v. Personnel Staffing Group, LLC
Civil Action No: 1:18-cv-03771 (PGG)

Dear Judge Gardephe:

We represent defendant Personnel Staffing Group, LLC (“Defendant”) with regard to the above referenced matter. We write with the consent of Plaintiffs Wesco Insurance Company and Technology Insurance Company, Inc. (“Plaintiffs”) and respectfully request that the Court So Order the enclosed joint stipulation allowing additional time for Defendant to answer, move or otherwise respond to Plaintiffs’ Complaint until August 20, 2018 and for a brief adjournment of the initial conference presently scheduled for July 26, 2018.

Defendant and Plaintiffs have been working diligently to resolve this matter in good faith. The parties respectfully request an extension of Defendant’s deadline to answer so that the parties can continue their productive settlement negotiations. Defendant’s answer was initially due on June 20, 2018. The parties entered into a stipulation extending Defendant’s time to answer, move or otherwise respond to the Complaint until July 20, 2018.

There is presently an initial conference scheduled in this matter for July 26, 2018. This conference has never been adjourned. In light of the parties’ continuing good faith settlement negotiations and the anticipated extension of Defendant’s time to answer, the parties jointly respectfully request an adjournment of the initial conference until after August 20, 2018. The



parties believe an adjournment of the initial conference will allow them to focus on a resolution of this matter rather than on proceeding with the litigation.

The parties are available at the Court's convenience to discuss any questions the Court may have with regard to the foregoing.

Respectfully submitted,

/s/ Alexandra Kamenetsky Shea

Alexandra Kamenetsky Shea

Enclosure

cc: Andrew J. Costigan, Esq. (via ECF and email)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WESCO INSURANCE COMPANY and
TECHNOLOGY INSURANCE COMPANY,
INC.,

Plaintiffs,

v.

PERSONNEL STAFFING GROUP, LLC,

Defendant.

Civil Action No. 1:18-cv-03771-PGG

**STIPULATION AND ORDER
EXTENDING TIME FOR
DEFENDANT TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFFS' COMPLAINT**

IT IS HEREBY stipulated and agreed by and between the undersigned counsel for plaintiffs, Wesco Insurance Company and Technology Insurance Company, Inc. ("Plaintiffs"), and defendant, Personnel Staffing Group, LLC ("Defendant"), that the time within which Defendant must answer, move, or otherwise respond to Plaintiffs' Complaint is hereby extended until August 20, 2018. One previous 30 day extension was requested and granted by this Court.

Signature page to follow

Dated: July 19, 2018
New York, New York

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*Counsel for Plaintiffs Wesco Insurance
Company and Technology Insurance
Company, Inc.*

*Counsel for Defendant Personnel Staffing
Group, LLC*

SO ORDERED:

Hon. Paul G. Gardephe
United States District Judge